



ALLIED PILOTS ASSOCIATION’S MOTION FOR SUMMARY JUDGMENT,” which is being filed concurrently with this motion. As further required by Local Rule 56.6 and by this Court’s summary judgment procedures, the documentary evidence relied on by APA in support of its motion for summary judgment is included in the “APPENDIX IN SUPPORT OF DEFENDANT/COUNTERCLAIM PLAINTIFF ALLIED PILOTS ASSOCIATION’S MOTION FOR SUMMARY JUDGMENT,” which is also being filed concurrently with this motion. The portion of each page of the appendix upon which APA relies, and cites to in the memorandum, has been highlighted by underline or by brackets in the margins or around the relevant text.

Accordingly, based on the factual and legal grounds stated in the APA’s accompanying memorandum brief, as supported by the argument and authorities set forth therein and by APA’s appendix of documentary evidence, APA respectfully requests that its motion for summary judgment be granted (1) dismissing Plaintiff/Counterclaim Defendant American’s Complaint (doc. 1) to vacate the arbitration award at issue in this case and (2) rendering judgment in APA’s favor on its Counterclaim (doc. 5) to enforce the arbitration award at issue herein. Upon so entering judgment in APA’s favor, APA further moves the Court to award APA its attorneys’ fees and costs incurred in litigating this case and to enter such further orders as may be just and appropriate in the circumstances.

Dated: June 25, 2012

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Respectfully submitted,

s/ Sanford R. Denison

SANFORD R. DENISON

Texas Bar No. 05655560

Baab & Denison, LLP

Stemmons Place, Suite 1100

2777 N. Stemmons Freeway

Dallas, TX 75207

Telephone: (214) 637-0750

Fax: (214) 637-0730

Email: denison@baabdenison.com

STEVEN K. HOFFMAN\*

D.C. Bar No. 384696

JEFF VOCKRODT\*

D.C. Bar No. 985635

James & Hoffman, P.C.

1130 Connecticut Avenue, NW, Suite 950

Washington, D.C. 20036

Telephone: (202) 496-0500

Fax: (202) 496-0555

Email: skhoffman@jamhoff.com

Email: jvockrodt@jamhoff.com

\* Admitted *Pro Hac Vice*

COUNSEL FOR DEFENDANT ALLIED  
PILOTS ASSOCIATION

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of June, 2012, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” via electronic mail on that date to counsel for all parties of record listed below.

DEE J. KELLY  
ROGER C. DISEKER  
Kelly Hart & Hallman LLP  
201 Main Street, Suite 2500  
Fort Worth, TX 76102  
Email: dee\_kelly@khh.com  
Email: roger\_diseker@khh.com

ATTORNEYS FOR PLAINTIFF  
AMERICAN AIRLINES, INC.

s/ Sanford R. Denison  
SANFORD R. DENISON